



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY

MICHAEL E. MCMAHON
DISTRICT ATTORNEY

[REDACTED]
[REDACTED]
[REDACTED]

January 28, 2020

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure:

On October, 16, 2011 Detective Stephen Napolitano received a substantiated allegation of "DRV-Other Department Rules-Procedures" for failing to return a PBA card to a motorist.

On March 11, 2018 Det. Napolitano received two substantiated allegations of "Invoice Discrepancy - Lab - Controlled Substance" and "Report Incomplete/Inaccurate - Property Clerk Invoice." As a result Det. Napolitano received a "verbal of instructions."

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] during office hours.

Sincerely,

[REDACTED]
[REDACTED]